

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

In re:)	Case No. 20-00411
)	
)	Chapter 11
RYAN'S ELECTRICAL SERVICES, LLC.,)	
)	
Debtors.)	OBJECTIONS TO CREDITOR GM
)	FINANCIAL'S: MOTIONS
)	FOR RELIEF FROM STAY, OR IN
)	THE ALTERNATIVE, MOTIONS
)	FOR ADEQUATE PROTECTION

COMES NOW, Debtor, and in support of his Objection to Motion for Relief from Stay, filed at Dockets ## 38, 39, 40, 41, 42, and 43, avers as follows:

1. Debtor objects to the Motion for Relief from Stay, as granting relief would cause irreparable harm to Debtor and Debtor's opportunity to reorganize.
2. The vehicles at issue, stemming from the Iowa Vehicle Retail Installment Contracts, are critical for the rehabilitation and successful reorganization of Debtor.
3. The vehicles are properly insured, and not subject to any non-commercial risks; adequate protection payments beyond post-petition monthly amounts due are not appropriate.
4. Debtor disputes any default on the obligation, and is working through such dispute with Counsel for Creditor.

WHEREFORE, Debtor objects to all six of Creditor GM Financial's: "Motions for relief from Stay, or in the alternative, motion for adequate protection", filed at Bankruptcy Docket ## 38, 39, 40, 41, 42, and 43; requests this court deny the relief sought by Movant Creditor; and for any further relief this court deem just and equitable.

RESPECTFULLY SUBMITTED,

/s/ Robert C. Gainer
Robert C. Gainer AT0000305
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 15, 2020, the foregoing instrument was filed electronically with the Clerk of Court using the CM/ECF system which sent notification of such filing to all registered users party to this case.

/s/ Robert C. Gainer